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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES, SOUTH DISTRICT

ANDREW TAYLOR, individually and )  
as successor-in-interest to Donta )  
Taylor; SHERRON OLIVER; CARL )  
TODD, JR., a Minor; CARMEN TODD, )  
a Minor; and CAMREN TODD, a Minor, )  
by and through their Guardian Ad )  
Litem SHERRON OLIVER, )

Plaintiff, )

vs. )

COUNTY OF LOS ANGELES; LOS )  
ANGELES COUNTY SHERIFF'S )  
DEPARTMENT; and DOES 1 through )  
50, Inclusive, )

Defendants. )  
\_\_\_\_\_ )

**ORIGINAL**

Case No.: TC028803

VIDEO DEPOSITION OF  
SAMUEL ALDAMA  
BEVERLY HILLS, CALIFORNIA  
MAY 16, 2018

ATKINSON-BAKER, INC.  
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REPORTED BY: Lois Sarkisian, CSR No. 13707, RPR  
FILE NO: AC052F6

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8 Plaintiff, )

9 vs. )

Case No.: TC028803

10 COUNTY OF LOS ANGELES; LOS )  
ANGELES COUNTY SHERIFF'S )  
11 DEPARTMENT; and DOES 1 through )  
50, Inclusive, )

12 Defendants. )  
13

14  
15  
16 Video deposition of Samuel Aldama taken on behalf  
17 of Plaintiffs, at 315 South Beverly Drive, Suite 305,  
18 Beverly Hills, California, commencing at 10:02 AM,  
19 Wednesday, May 16, 2018, before Lois Sarkisian,  
20 CSR No. 13707, RPR.  
21  
22  
23  
24  
25

A P P E A R A N C E S

FOR PLAINTIFFS:

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Dougday@beckslaw.com

Also Present:

Albert Salaz, Videographer

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I N D E X

WITNESS: Samuel Aldama

EXAMINATION:	PAGE
By Mr. Sweeney	6,133
BY Mr. Day	128

E X H I B I T S

FOR PLAINTIFFS

NUMBER	DESCRIPTION	PAGE
1	Copy of Document No. 016-10848-2811-013, Interview of Deputy Samuel Aldama, Dated August 30, 2016, Bates stamped DEF 0052 through DEF 0054, 3 pages	87

FOR DEFENDANTS:

1	Copy of Bates stamped document DEF 0158 which includes a map, 1 page	128
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1 Beverly Hills, California, Wednesday, May 16, 2018, 10:02 AM  
2 --oOo-- 10:02:36  
3 THE VIDEOGRAPHER: Good morning. I am Albert Salaz, 10:02:36  
4 your videographer. I represent Atkinson Baker in Glendale 10:02:47  
5 California. I'm a notary public. I'm not financially 10:02:52  
6 interested in this action nor a relative or employee of any 10:02:55  
7 attorney or any of the parties. 10:02:58  
8 The date is May 16, 2018, and we are on the record 10:03:00  
9 at 10:03 AM. This deposition is taking place at 315 South 10:03:04  
10 Beverly Drive, Suite 305, Beverly Hills, California, 90212; 10:03:11  
11 case number TC 028803, case entitled Andrew Taylor et al., 10:03:16  
12 versus County of Los Angeles. The deponent is deputy Samuel 10:03:24  
13 Aldama. This deposition is taking place -- or this 10:03:30  
14 deposition is taken on behalf of the plaintiff. Your court 10:03:34  
15 reporter today is Lois Sarkisian from Atkinson Baker. 10:03:38  
16 Will counsel from both parties identify themselves. 10:03:46  
17 MR. SWEENEY: John Sweeney for the plaintiffs. 10:03:51  
18 MS. HOIKKA: Nicole Hoikka for the plaintiffs. 10:03:54  
19 MR. DAY: Douglas Day on behalf of the Defendants. 10:03:56  
20 THE VIDEOGRAPHER: Thank you. Will the court reporter 10:03:58  
21 please administer the oath. 10:04:00  
22 Samuel Aldama, 10:04:00  
23 having first been duly sworn, was 10:04:00  
24 examined and testified as follows: 10:04:00  
25 THE VIDEOGRAPHER: Please begin.



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1 Q Who felt that you earned it? 11:26:23  
2 A Our peers at the station. 11:26:27  
3 Q What peers? Your peers? You don't know the name, 11:26:35  
4 correct? 11:26:41  
5 A Well, the deputies who work at the station. 11:26:42  
6 Q Okay. So there is some type of voting then, 11:26:45  
7 correct? 11:26:49  
8 MR. DAY: Objection; no foundation. 11:26:49  
9 THE WITNESS: No. 11:26:53  
10 BY MR. SWEENEY: 11:26:54  
11 Q Well, if your peers recommend it, they have to 11:26:54  
12 recommend it to somebody, and somebody makes a decision, 11:26:58  
13 correct? 11:27:02  
14 A It's not recommended, sir. 11:27:10  
15 Q But your peers -- you just testified that your 11:27:13  
16 peers recommend you, correct? 11:27:16  
17 A Our peers think something of hard work and 11:27:31  
18 dedication, sir, to the station. 11:27:39  
19 Q And they tell somebody that and that person sends 11:27:43  
20 this tattoo artist over to you? 11:27:47  
21 A They don't tell nobody. They just recommend me. 11:27:57  
22 Q Who do they recommend you to? 11:28:02  
23 A Not recommend me. They just give me the -- a 11:28:06  
24 contact information of the guy. 11:28:11  
25 Q Who gives you the contact information, your peers?

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1	A	Peers who have gotten tattoos by him.	11:28:20
2	Q	Who have what?	11:28:25
3	A	Peers who have gotten tattoos.	11:28:26
4	Q	Who have those same tattoos from Compton?	11:28:28
5	A	Not the same tattoos; other tattoos.	11:28:32
6	Q	What other tattoos?	11:28:35
7	A	Other random tattoos, sir.	11:28:41
8	Q	How many tattoos have you seen like yours?	11:28:44
9	A	A few.	11:28:53
10	Q	How many is a few? Is it more than 10?	11:28:57
11	A	Yes.	11:29:08
12	Q	More than 20?	11:29:10
13	A	No.	11:29:15
14	Q	Pretty exclusive club then, correct?	11:29:18
15	MR. DAY:	Objection; argumentative.	11:29:20
16	THE WITNESS:	No.	11:29:25
17	BY MR. SWEENEY:		11:29:26
18	Q	What do the flames symbolize on your tattoo?	11:29:27
19	A	It's just a design around the skull.	11:29:35
20	Q	It's what?	11:29:41
21	A	A design.	11:29:41
22	Q	Around the skull?	11:29:42
23	A	Yes, sir.	11:29:43
24	Q	What color are the flames?	11:29:44
25	A	There's no color in the flames.	

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1 that's why you were chasing him? 11:58:02

2 A Possibly, sir. 11:58:04

3 Q Did you see him with a gun that day? 11:58:07

4 A I don't recall, sir. 11:58:19

5 Q So if I have the police report, it's going to say 11:58:26

6 in there -- it's not going to make any mention in there that 11:58:31

7 Sheldon Lockett possessed a gun that day, correct? 11:58:37

8 MR. DAY: Objection; argumentative, no foundation. 11:58:42

9 THE WITNESS: I'm not sure what the report is going to 11:58:46

10 say, sir. 11:58:48

11 BY MR. SWEENEY: 11:58:51

12 Q Let's put this report aside for a second and talk 11:58:52

13 about your recollection of the event today. Did Sheldon 11:58:56

14 Lockett have a gun that day? Did you see him with a gun 11:59:01

15 before the chase? 11:59:08

16 A I don't remember, sir. 11:59:18

17 Q Then why were you chasing him? 11:59:27

18 A I don't recall the incident, sir. 11:59:47

19 Q Okay. 12:00:01

20 Do you harbor any racial animus toward African 12:00:04

21 Americans? 12:00:32

22 A Could you rephrase that question, sir? 12:00:32

23 Q Do you know what animus means? Do you have any ill 12:00:34

24 feelings toward African Americans in general? 12:00:41

25 A Ill feelings? I'm not --



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1	Q	I'm sorry?	12:01:00
2	A	Could you repeat that question one more time, sir.	12:01:01
3	Q	Do you have any ill feelings in general against	12:01:03
4		African Americans?	12:01:06
5	A	I have feelings for African Americans, sir.	12:01:43
6	Q	What are your feelings?	12:01:56
7	A	They are just human beings, sir.	12:01:58
8	Q	Did you hear my question, sir? Do you have any ill	12:02:01
9		feelings toward African Americans?	12:02:09
10	A	I do, sir.	12:02:24
11	Q	Okay. Tell me about your feelings.	12:02:31
12	A	I grew up in the city of Compton, sir, mostly	12:02:34
13		Hispanics, African Americans so I, you know, pretty much	12:02:46
14		grew up with everyone around. I'm not --	12:02:50
15	Q	So what is the source of your ill feelings?	12:02:54
16	MR. DAY:	Counsel, I don't think the witness was done	12:02:57
17		with his answer.	12:02:59
18	MR. SWEENEY:	I'm sorry?	12:03:00
19	MR. DAY:	I don't think the witness was done with his	12:03:01
20		answer.	12:03:03
21	BY MR. SWEENEY:		12:03:04
22	Q	I'm just trying to -- I'll withdraw the question.	12:03:04
23		What is the source of your ill feelings toward	12:03:07
24		African Americans?	12:03:09
25	A	Like I said, sir, I grew up in the city of Compton,	

1 and I have no problems or anything with -- 12:03:25

2 Q You said you had ill feelings toward African 12:03:28

3 Americans. What is the source? Have they done something to 12:03:31

4 you? 12:03:34

5 A No, I don't have any ill feelings. 12:03:34

6 Q Didn't he just say he had ill feelings? 12:03:37

7 A I misunderstood the question then, sir. 12:03:42

8 Q Okay. Is there some racial animosity between 12:03:45

9 blacks and Hispanics in Compton? 12:03:51

10 A No, sir. 12:03:53

11 Q Let's take a break. 12:03:58

12 THE VIDEOGRAPHER: We are going off the record. The 12:04:00

13 time is 12:04 PM. 12:04:04

14 (A break was taken in the proceedings.) 12:04:09

15 THE VIDEOGRAPHER: We're back on the record. The time 12:21:28

16 is 12:21 PM. 12:21:40

17 MR. DAY: Counsel, before you go back to your 12:21:42

18 questioning, Deputy Aldama wanted to make a comment about 12:21:46

19 your last -- the last couple of questions and his response. 12:21:52

20 MR. SWEENEY: Okay. Let me just put on the record that 12:21:54

21 Deputy Aldama has consulted with counsel, and after about a 12:22:00

22 15-minute break you have something new to say. Say it. 12:22:07

23 MR. DAY: Well, the 15-minute break had nothing to do 12:22:11

24 with conference, the length of conference with counsel, 12:22:14

25 since I was also conferencing with you, Mr. Sweeney, but go

1 ahead, Deputy. 12:22:21

2 THE WITNESS: I just want to say I misunderstood the 12:22:22

3 question. I'm not -- I don't have any ill feelings. 12:22:24

4 BY MR. SWEENEY: 12:22:29

5 Q Okay. 12:22:30

6 Growing up, did you have any physical altercations 12:22:35

7 with African Americans in Compton? 12:22:39

8 A No, sir. 12:22:41

9 Q Do you know the name of an arrestee by the name of 12:22:43

10 Jeremiah Wilkerson? Does that ring a bell? 12:23:07

11 A No, sir. Jeremiah Wilkerson, no. 12:23:17

12 Q Do you know about an incident between Orrego and 12:23:22

13 Jeremiah Wilkerson where Mr. Wilkerson alleged that Deputy 12:23:25

14 Orrego used excessive force? 12:23:30

15 MR. DAY: Objection; calls for speculation. 12:23:37

16 THE WITNESS: No, sir. 12:23:39

17 MR. SWEENEY: This is a good place to take a break. I'm 12:23:39

18 ready to go into the Donta Taylor incident. 12:23:42

19 MR. DAY: Okay. 12:23:46

20 MR. SWEENEY: Off the record. 12:23:47

21 THE VIDEOGRAPHER: We're going off the record. The time 12:23:48

22 is 12:23 PM. 12:23:50

23 (A lunch break was taken at 12:23 PM 12:23:50

24 until 1:35 PM.) 13:31:46

25 THE VIDEOGRAPHER: We are back on the record. The time

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1	two weeks of --	15:14:17
2	MR. DAY: Our receipt?	15:14:21
3	MR. SWEENEY: Of your receipt. And then what did I say?	15:14:22
4	MR. DAY: You said 14 days after.	15:14:28
5	MR. SWEENEY: Fourteen more days to notify us of any	15:14:30
6	changes.	15:14:33
7	MR. DAY: So stipulated.	15:14:33
8	MR. SWEENEY: Thank you, Deputy, for coming.	15:14:35
9	THE VIDEOGRAPHER: This is the end of the video	15:14:39
10	deposition of Deputy Samuel Aldama. We are going off the	15:14:41
11	record. The time is 3:14 PM.	15:14:46
12	(The deposition was concluded at 3:14 PM.)	15:14:46
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1 STATE OF \_\_\_\_\_)

2 COUNTY OF \_\_\_\_\_)

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6

7 I, the undersigned, declare under penalty

8 of perjury that I have read the foregoing transcript,

9 and I have made any corrections, additions or

10 deletions that I was desirous of making; that the

11 foregoing is a true and correct transcript of

12 my testimony contained therein.

13 EXECUTED this \_\_\_\_\_ day of \_\_\_\_\_,

14 \_\_\_\_\_, at \_\_\_\_\_, \_\_\_\_\_.  
(City) (State)

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\_\_\_\_\_  
SAMUEL ALDAMA



REPORTERS CERTIFICATE

I, LOIS SARKISIAN, CSR No. 13707, RPR, Certified  
Shorthand Reporter, certify:

That the foregoing proceedings were taken before  
me at the time and place therein set forth, at which time  
the witness was put under oath by me;

That the testimony of the witness, the questions  
propounded, and all objections and statements made at the  
time of the examination were recorded stenographically by me  
and were thereafter transcribed;

That the foregoing is a true and correct transcript  
of my shorthand notes so taken.

I further certify that I am not a relative or  
employee of any attorney of the parties, nor financially  
interested in the action.

I declare under penalty of perjury under the laws  
of California that the foregoing is true and correct.

Dated this 20<sup>th</sup> day of May, 2018.

Lois Sarkisian

Lois Sarkisian, CSR No. 13707, RPR